

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
GARY L. HALLING, Cal. Bar No. 66087
3 MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524
Four Embarcadero Center, 17th Floor
4 San Francisco, California 94111-4106
Telephone: 415-434-9100
5 Facsimile: 415-434-3947

6 Attorneys for Defendants
MEDIANEWS GROUP, INC. and
7 CALIFORNIA NEWSPAPERS PARTNERSHIP

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 CLINTON REILLY,

13 Plaintiff,

14 v.

15 MEDIANEWS GROUP, INC.; THE
16 HEARST CORPORATION; STEPHENS
GROUP INC.; GANNETT CO., INC.; and
17 CALIFORNIA NEWSPAPERS
PARTNERSHIP,

18 Defendants.
19

Case No. 06-CV-04332-SI

[Complaint Filed: July 14, 2006]

STIPULATION AND ~~PROPOSED~~
ORDER REGARDING HEARING ON
MOTION FOR TEMPORARY
RESTRAINING ORDER

Judge: Hon. Susan Illston
Courtroom: 10, 19th Floor

Trial Date: None set

20
21 WHEREAS on July 14, 2006 Plaintiff Clinton Reilly filed a complaint seeking
22 injunctive relief with respect to certain transactions described therein;

23 WHEREAS Plaintiff is prepared to file a motion for temporary restraining order on
24 Monday, July 24, 2006;

25 WHEREAS Plaintiff and Defendants MediaNews Group, Inc., The Hearst
26 Corporation, Stephens Group, Inc., Gannett Co., Inc. and California Newspapers Partnership,
27 (collectively, "Defendants") wish to coordinate an expedited briefing and hearing schedule, with
28 such motion to be heard at 2:00 p.m. on Thursday, July 27, 2006;

1 WHEREAS Defendants have represented that they will not close the transactions
2 that are the subject of Plaintiff's motion for temporary restraining order prior to the hearing on
3 Thursday, July 27, 2006;

4 NOW THEREFORE it is hereby stipulated and agreed by and between Plaintiff
5 and Defendants that:

6 1. Plaintiff shall file and serve his motion for temporary restraining order by
7 12:00 noon on Monday July 24, 2006.

8 2. Defendants shall file and serve their oppositions to such motion by
9 5:00 p.m. on Tuesday, July 25, 2006.

10 3. A reply, if any, shall be served and filed by 12:00 noon on Wednesday, July
11 26, 2006.

12 4. The hearing on Plaintiff's motion for temporary restraining order shall be in
13 Courtroom 10 at 2:00 p.m. on Thursday, July 27, 2006.

14
15 IT IS SO STIPULATED.

16
17 Dated: July 24, 2006

18 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
19 Four Embarcadero Center, 17th Floor
20 San Francisco, California 94111-4106
21 Telephone: 415-434-9100
22 Facsimile: 415-434-3947

23 By


GARY L. HALLING

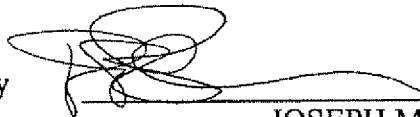
24 Attorneys for Defendants
25 MEDIANEWS GROUP, INC. and
26 CALIFORNIA NEWSPAPERS PARTNERSHIP,
27 and on behalf of All Defendants
28

1 Dated: July 24, 2006

2 ALIOTO LAW FIRM
3 JOSEPH M. ALIOTO
4 JOSEPH M. ALIOTO, JR.
5 THOMAS P. PIER
6 555 California Street, Suite 3160
7 San Francisco, CA 94104
8 Telephone: (415) 434-8900
9 Facsimile: (415) 434-9200

10 GRAY, PLANT, MOOTY, MOOTY & BENNETT, P.A.
11 DANIEL R. SHULMAN
12 500 IDS Center, 80 South Eighth Street
13 Minneapolis, MN 55402
14 Telephone: (612) 632-3335
15 Facsimile: (612) 632-4335

16 By



17 JOSEPH M. ALIOTO
18 DANIEL R. SHULMAN

19 Attorneys for Plaintiff
20 CLINTON REILLY

21 ORDER

22 PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED.

23 July 24, 2006



24 HON. SUSAN ILLSTON
25 UNITED STATES DISTRICT COURT JUDGE